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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Jaiya Webbs

Plaintiff,

v.

Brandon Elliott Green,

Defendant.

Case Action No. 24-cv-7763

**DECLARATION OF JAIYA WEBBS**

I, Jaiya Webbs, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request that this Court enter a default judgment against Defendant and set this matter down for an inquest.

2. I request the Court enter a default judgment against the defendant, Brandon Elliott Green (“Defendant” or “Green”).

3. Defendant and I were once in a romantic relationship but broke up in August of 2023.

4. Defendant did not take the break up well, something he made clear to the world when he posted on his X account on May 23, 2024 “Follow my Reddit for my photo dump” and “If I give u everything and u leave me nothing best believe we enemies...And now it’s time for

the gloves to come off” and then posted a link to “[Mature Content] From the EbonyThroatQueens” on which he had posted three videos of me fully naked and/or engaging in sexual acts.

5. I am fully identifiable in these videos. In two I am performing a sexual act and in the other I am fully naked and showering.

6. I never provided Defendant with permission to share these videos with anyone – much less online for the world to see.

7. Additionally, Defendant posting links to the videos on his X account was especially horrifying, as I know many of our friends and family follow him there.

8. Defendant clearly knew I would be upset by this, which is why he sent me a link to taunt me. Further, his posts immediately before state we are enemies and he is taking his “gloves” off. Defendant intended to cause me emotional distress and he succeeded.

9. My damages are numerous as Defendant’s sharing has devastated me and my family. As such, I am requesting that the court grant me statutory damages plus that Defendant be required to pay my attorney fees and the costs of this case and enjoined from ever sharing my images again.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 29, 2024

/s/ Jaiya Webbs  
Jaiya Webbs